

United States District Court
District of Massachusetts

Dorel Steel Erection Corporation)
Plaintiff)
vs.)
Capco Steel Corporation) Civil Action no. 05-10627 WGY
Defendant)
and)
Canam Steel Corporation)
Reach and Apply Defendant)

Joint Statement for Initial Scheduling Conference

1. Proposed Agenda: The parties wish to establish their pretrial schedule. The parties do not present a settlement agenda because it is not amenable to this case without discovery.
2. Proposed Schedule: The parties do not see this as a "complex" case as defined by the federal rules and, therefore, would be satisfied with ten depositions, 25 interrogatories, 25 requests for admissions, and Two separate sets of requests for production. The proposed deadline for each would be:

5/16/05	Initial disclosure as required by the rules,
6/15/05	Joinder of additional parties and amendments to the pleadings,
6/30/05	Service of all written discovery,
8/31/05	Completion of all discovery,
10/31/05	Deadline for filing Motions for Summary Judgment.

3. Certificate of Consultation: The Parties will file Their local Rule 16(d)(3) Certification on or before the Initial Scheduling Conference.
4. Consent to Trial by Magistrate: The parties consent to trial by magistrate.

Dorel Steel Erection Corporation
By its attorney,

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Capco Steel Corporation
By Its Attorney

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